

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

- - -

IN RE: NATIONAL : HON. DAN A.  
: POLSTER

PRESCRIPTION OPIATE :

LITIGATION :

:  
APPLIES TO ALL CASES : NO.  
: 1:17-MD-2804

- HIGHLY CONFIDENTIAL -

SUBJECT TO FURTHER CONFIDENTIALITY REVIEW

- - -

MARCH 27, 2019

- - -

VOLUME III

Videotaped sworn continued  
videotaped deposition of BRIAN LORTIE,  
taken pursuant to notice, was held at  
McCARTER & ENGLISH, LLP, 1600 Market  
Street, Suite 3900, Philadelphia,  
Pennsylvania, beginning at 10:40 a.m.,  
on the above date, before Margaret M.  
Reihl, a Registered Professional  
Reporter, Certified Shorthand Reporter,  
Certified Realtime Reporter, and Notary  
Public.

- - -

GOLKOW LITIGATION SERVICES  
877 370.3377 ph | 917.591.5672 fax  
deps@golkow.com

1 A P P E A R A N C E S:

2 SEEGER WEISS LLP  
3 BY: JENNIFER SCULLION, ESQUIRE  
SABRINA TYJER, PARALEGAL  
4 77 Water Street  
New York, New York 10005  
5 (212) 584-0700  
jscullion@seegerweiss.com  
6 Representing the Plaintiffs

7  
8 BRANSTETTER, STRANCH & JENNINGS, PLLC  
9 BY: JOE P. LENISKI, JR., ESQUIRE  
The Freedom Center  
223 Rosa L. parks Avenue, Suite 200  
10 Nashville, Tennessee 37203  
(625) 254-8801  
11 joyl@bsjfirm.com  
Representing the Tennessee Plaintiffs

12  
13 GOODELL DEVRIES LEECH & DANN, LLP  
14 BY: ROBERT LIMBACHER, ESQUIRE  
ADAM S. TOLIN, ESQUIRE  
15 Two Commerce Square  
2001 Market Street, Suite 3700  
16 Philadelphia, Pennsylvania 19103  
(267) 765-3600  
17 rlimbacher@gdldlaw.com  
atolin@gdldlaw.com  
18 Representing the Defendant Endo and  
the witness

1 A P P E A R A N C E S: (cont'd)

2  
3 PIETRAGALLO GORDON ALFANO  
BOSICK & RASPANTI, LLP  
4 BY: ASHLEY KENNY, ESQUIRE  
1818 Market Street, Suite 3402  
5 Philadelphia, Pennsylvania 19103  
(215) 988-1464  
6 ak@pietragallo.com  
Representing Cardinal Health

1 APPEARANCES VIA TELECONFERENCE AND STREAM  
2 ULMER & BERNE, LLP  
3 BY: SARAH M. BENOIT, ESQUIRE  
65 East State Street, Suite 1100  
4 Columbus, Ohio 44113  
(261) 583-7000  
sbenoit@ulmer.com  
5 Representing Amneal Pharmaceuticals, Inc

6  
7 JONES DAY  
8 BY: TAYLOR GOODSPEED, ESQUIRE  
555 California Street, 26th Floor  
9 San Francisco, California 94104-1500  
(415) 875-5804  
tgoodspeed@jonesday.com  
10 Representing the Defendant Walmart

11 REED SMITH LLP  
12 BY: ABIGAIL PIERCE, ESQUIRE  
Three Logan Square  
1717 Arch Street, Suite 3100  
13 Philadelphia, Pennsylvania 19103  
(215) 851-8280  
14 apierce@reedsmith.com  
rblake@reedsmith.com  
15 Representing the Defendant AmerisourceBergen

16  
17 ARNOLD & PORTER KAYE SCHOLER LLP  
18 BY: JOANNA PERSIO, ESQUIRE  
601 Massachusetts Ave., NW  
19 Washington, DC 20001  
(202) 942-5504  
joanna.persio@arnoldporter.com  
20 Representing the Defendant Endo Pharmaceuticals,  
Inc. and Endo Health Solutions, Inc

1  
2 A P P E A R A N C E S: (cont'd)  
3  
4 BAILEY & WYANT, PLLC  
5 BY: HARRISON M. CYRUS, ESQUIRE  
6 500 Virginia Street East, Suite 600  
7 Charleston, West Virginia 25301  
8 hcyrus@baileywyant.com  
9 Representing West Virginia Board of Pharmacy  
10  
11  
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20 ALSO PRESENT:  
21 Sandra D'Orio, Litigation Counsel, Endo  
22 Bill Geigert, Videographer  
23  
24

1 I N D E X  
2 WITNESS PAGE  
3 BRIAN LORTIE  
4 By Ms. Scullion 692  
5 By Mr. Leniski 800  
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7 E X H I B I T S  
8 NO. DESCRIPTION PAGE  
9 Endo-  
Lortie-66 E-mail string, top one  
dated 3/25/19  
Subject: Opiates 30(b)(6)  
failures 692  
10  
11 Endo-  
Lortie-67 Timeline "endo History of  
Major Drugs"  
(previously marked  
Campanelli 212) 692  
12  
13 Endo-  
Lortie-68 Two charts, "1999-2017  
(June) Endo Total Pills/  
Unite Shipped  
[E1811.1] two pages 692  
14  
15  
16 Endo-  
Lortie-69 \*\*Skipped  
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19 Endo-  
Lortie-70 E-mail dated 7/14/03  
Subject: Action Plan to  
Prevent Diversion, with  
attachment  
[ENDO-OPIOID\_MDL-01692316  
through 01692321  
and E0548.1 through 0548.6] 692  
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1 E X H I B I T S  
2 NO. DESCRIPTION PAGE  
3 Endo-  
Lortie-71 E-mail string, top one  
dated 11/14/11  
Subject: FW: V8-Minor  
Tweaks Awakening to REMS  
RD Lunch and Learn Nov 15  
2011 DRAFT Slides  
[ENDO-CHI\_LIT-00241435  
through 00241436  
and E0715.1 through 0715.30] 692  
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9 Endo-  
Lortie-72 Risk Management Plan for  
Opioid Analgesics  
Focus On: Oxycodone ER  
February 19, 2004  
[ENDO-OPIOID\_MDL-01500831  
through 0778.106] 692  
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Lortie-73 \*\*Skipped  
14 Endo-  
Lortie-74 \*\*Skipped  
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16 Endo-  
Lortie-75 E-mail dated 10/3/16  
Subject: Pilot doctors  
pharmacy data  
with attachment  
[ENDO-OPIOID\_MDL-01905809] 815  
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1 (Documents marked for  
2 identification as Endo-Lortie Deposition  
3 Exhibit Numbers 66, 67, 68, 70, 71 and  
4 72.)  
5 THE VIDEOGRAPHER: Good morning.  
6 We are now on the record. My name is  
7 Bill Geigert, I'm the videographer for  
8 Golkow Litigation Services. Today's  
9 date is March 27th, 2019, and the time  
10 is 10:40 a m.  
11 This video deposition is being  
12 held in Philadelphia, Pennsylvania in  
13 the matter of National Prescription  
14 Opiate Litigation. The deponent is  
15 Brian Lortie. Counsel will be noted on  
16 the stenographic record.  
17 The court reporter is Peg Reihl,  
18 and she will now swear in the witness.  
19 ... BRIAN LORTIE, having been  
20 duly sworn as a witness, was examined  
21 and testified as follows:  
22 BY MS. SCULLION:  
23 Q. Good morning, Mr. Lortie.  
24 Welcome back.

Page 693

1 A. Thank you.  
 2 Q. Just as a reminder, it's been a  
 3 few weeks since our last session together. I'm  
 4 going to be asking you questions today and  
 5 asking for your complete and truthful answers.  
 6 If you don't understand any of my questions  
 7 today, would you let me know that?  
 8 A. Yes, I will.  
 9 Q. Thank you. And is there any  
 10 reason you can't give your best testimony today?  
 11 A. No, there's not.  
 12 Q. You're not taking any  
 13 medications, for example, that would interfere  
 14 with your cognitive abilities today?  
 15 A. That's correct.  
 16 Q. Okay. Terrific. We've placed in  
 17 front of you a number of exhibits that we've  
 18 premarked. If you'll turn to the first exhibit,  
 19 which is Exhibit 66.  
 20 A. Okay.  
 21 Q. And it says at the top regarding  
 22 "Opiates: 30(b)(6) failures."  
 23 Do you see that?  
 24 A. Yes, I do.

Page 695

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 17 [REDACTED]  
 18 MR. LIMBACHER: Object to form.  
 19 Jen, just so we're clear, I think the  
 20 agreement that counsel had with each  
 21 other is reflected on the first couple  
 22 pages of your Exhibit 6, where you  
 23 memorialized accurately the very narrow  
 24 topics on which Mr. Lortie was being

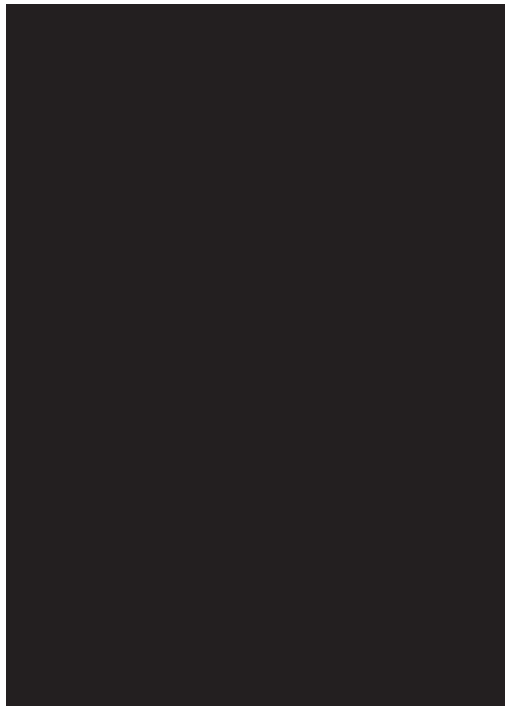
Page 694

1 Q. Okay. Mr. Lortie, do you  
 2 understand you're here today to testify as  
 3 Endo's corporate representative on certain  
 4 specific topics; is that right?  
 5 A. I do, yes.  
 6 Q. Okay. So you're going to be  
 7 providing me today with Endo's knowledge on the  
 8 topics, correct?  
 9 MR. LIMBACHER: Object to form.  
 10 THE WITNESS: That's correct.  
 11 BY MS. SCULLION:  
 12 Q. So if you'll turn to page 6 of  
 13 Exhibit 66. It's this page at the bottom you'll  
 14 see the words "Topic 30."  
 15 A. Mine aren't numbered, so I'll  
 16 just count.  
 17 Q. Yes.  
 18 A. Six, yes, Topic 30, yes.

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1 produced for purposes of this  
 2 supplemental deposition. So you're  
 3 going back now to e-mail exchanges with  
 4 counsel who are not here that go back  
 5 into January of this year, so I just  
 6 want to make sure there's no confusion  
 7 on the record.  
 8 BY MS. SCULLION:  
 9 Q. So, Mr. Lortie, if you'll go to  
 10 the first page of Exhibit 66, do you see at the  
 11 bottom the e-mail from myself to Joshua Davis  
 12 and Adam Tolin dated March 25th, 2019?  
 13 A. Yes, I do.

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and just so the record is clear, Jen,  
your Exhibit 66 includes Josh Davis'  
e-mail to you of January 31, 2019, but

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Mr. Tolin did not respond by  
saying there was anything missing or  
additional that needed to be added  
beyond my January 28th e-mail, so if  
there's anything that you think is in  
the letter you just referenced from  
Mr. Davis that changes or limits what  
was set forth in my January 28th e-mail  
coupled with the provisos in the  
March 25th e-mail, we need to know that  
now. We had intended this to be clear  
before he walked in today, and this time  
is not coming out of our two hours.

MR. LIMBACHER: Well, he's here  
today to testify with regard to abuse  
and diversion aspects of Topic 30 and 32  
on the very narrow subjects you  
identified in your March 25th, 2019  
e-mail, specifically opioids sold by  
Endo other than Opana ER and for the  
period after Mr. Lortie left Endo in  
2016.

If we're going to get into the  
minutiae of what the parties did going

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it does not include the attachment to  
that e-mail, which is a 35-page letter  
that Mr. Davis sent to you on  
January 31st, 2019 that I think lays out  
in detail Endo's position with regard to  
the appropriate scope of the various  
topics on which he was previously  
offered and for which he is being  
offered today in a supplemental  
deposition.

MS. SCULLION: Can you mark the  
record because we're going to have to  
have a colloquy come out of my time.

Mr. Limbacher, the purpose of me  
sending the e-mail on March 25th that is  
reflected in Exhibit 66 in which -- to  
which Mr. Tolin responded that's correct  
was to eliminate any confusion as to  
what topics Mr. Lortie is being offered  
on, and my e-mail does specifically say  
that he is being offered on the abuse  
and diversion aspects of Topics 30 and  
32 as set forth in my January 28th  
e-mail below.

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back and forth trying to reach some  
understanding with regard to the topics  
on which he is being offered, both at  
his prior deposition and here today, I  
think it's appropriate that we include  
in the record Mr. Davis' letter to you  
of January 31, 2019, which was  
subsequent to your e-mail of January 28,  
2019.

I'm prepared to have him answer  
questions within the scope of your  
March 25th e-mail. I'm not sure why you  
feel it necessary to waste some of your  
two hours digging back into the weeds on  
the parties back-and-forth over the last  
several months with regard to the scope  
of the 30(b)(6) deposition topics.

MS. SCULLION: Based on your  
representation that we're going forward  
based on our March 25th e-mail, that's  
fine.

BY MS. SCULLION:

Q. Mr. Lortie, as we proceed today,  
if there are any questions to which you don't

Page 701

1 actually know the answer, would you please let  
2 me know that as opposed to just giving me your  
3 assumption or your speculation?

4 A. I will do my best, yes.

5 Q. Okay, thank you.

6 So if you'll turn to what's been  
7 put in front of you marked as Exhibit 67, and  
8 it's labeled "Endo History of Major Drugs."  
9 Mr. Lortie, this is, if you see in the bottom  
10 right-hand corner, an exhibit that was marked  
11 and used at Mr. Campanelli's deposition as  
12 Exhibit 212, and it's just a timeline we put  
13 together from the FDA information to outline the  
14 history of certain dates with respect to opioids  
15 sold by Endo and just providing this as means of  
16 some orientation here for you.

17 Mr. Lortie, one of the topics --  
18 I'm sorry -- one of the drugs you're prepared to  
19 speak to today with respect to abuse and  
20 diversion policies is Percocet, correct?

21 A. Yes, that's correct. Can I just  
22 ask a clarifying question?

23 Q. Sure.

24 A. So I think you said you produced

Page 702

1 this. This is not from some Endo deck or --

2 Q. That is correct. So this is a  
3 demonstrative timeline we put together. The  
4 source of the information is in the bottom  
5 left-hand corner. It's coming from the FDA  
6 website, and in the bottom right-hand corner is  
7 the exhibit sticker. This was used at  
8 Mr. Campanelli's deposition.

9 A. Thank you. I understand.

10 Q. Okay. And, again, just by way of  
11 orientation, Percocet is an oxycodone APAP  
12 combination drug, correct?

13 A. Yes, that's correct.

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Q. What were those?

A. A large list of topics. In fact, if it's okay, I can refer to the binder that I brought with me that has a summary of those things.

Q. Yeah, could I have the binder?

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MR. LIMBACHER: Could we give her a copy.

MS. SCULLION: Thank you.

BY MS. SCULLION:

Q. And before you look at the binder, these are materials that you reviewed in preparation for today's deposition?

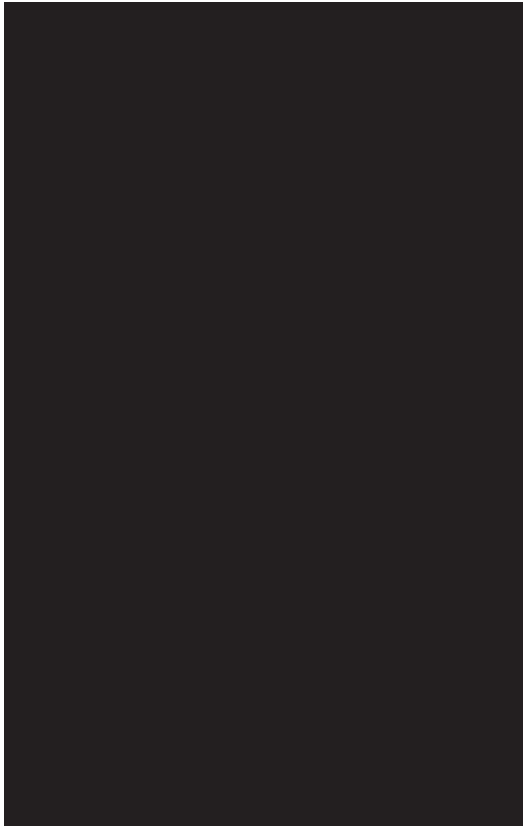
A. That is correct.

Q. Okay.



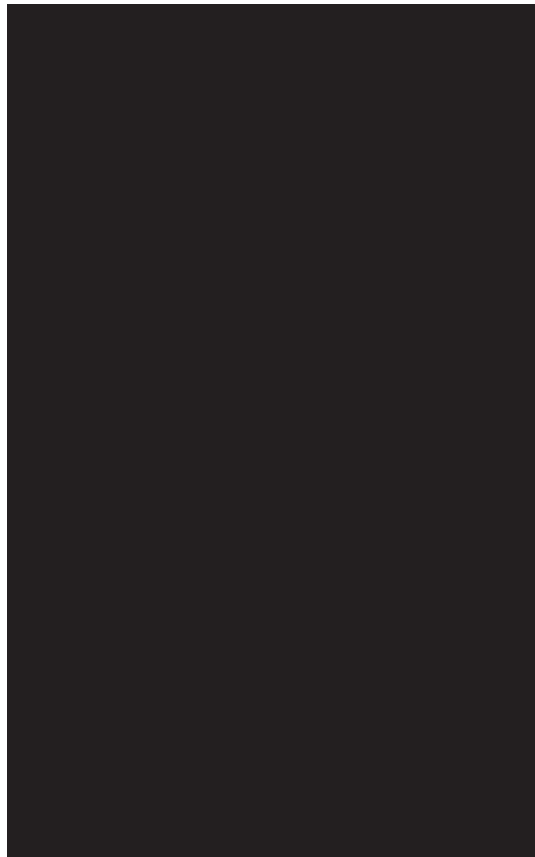
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BY MS. SCULLION:

Q. Okay. Let's get some orientation into what the volumes were.

I've handed you what's been marked as Exhibit 68. Let me explain 68 here.

Sixty-eight has two pages, both of these are -- easier to do it one piece at a time.

The front page of Exhibit 68 you'll see in the bottom right-hand corner is marked Exhibit 206, and this was used as a demonstrative at Mr. Campanelli's deposition again, and what this chart is is a demonstrative that tallies up the data that we received from Endo in the litigation, and we have on the second page simply blown up the chart that's on the first page, so it is just easier to use.

That's what this is, all right?

A. Yeah, I can see that.

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Q. Okay. So let's -- I think using the second page of Exhibit 68 is going to be easier, so I'm just going to turn to that, if you want to turn to the second page.

MR. LIMBACHER: Jen, I don't mean to interrupt, but will you grant me a continuing objection to the use of this exhibit on the grounds that it falls outside the scope of the topics on which he has been designated for this supplemental deposition, and, indeed, he has now testified that volume of sales did not impact Endo's policies and processes to minimize the risk of abuse and diversion?

MS. SCULLION: I'll grant the continuing objection and move to strike all of the reiteration of or attempted reiteration of the witness' testimony, and I would disagree with the objection.

BY MS. SCULLION:

Q. So, Mr. Lortie, again, just to give context to what Endo did not take account of in terms of adjusting its policies, look at

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the first line of the chart. You'll see an entry for Endocet.

Do you see that?

A. Yes, I do.



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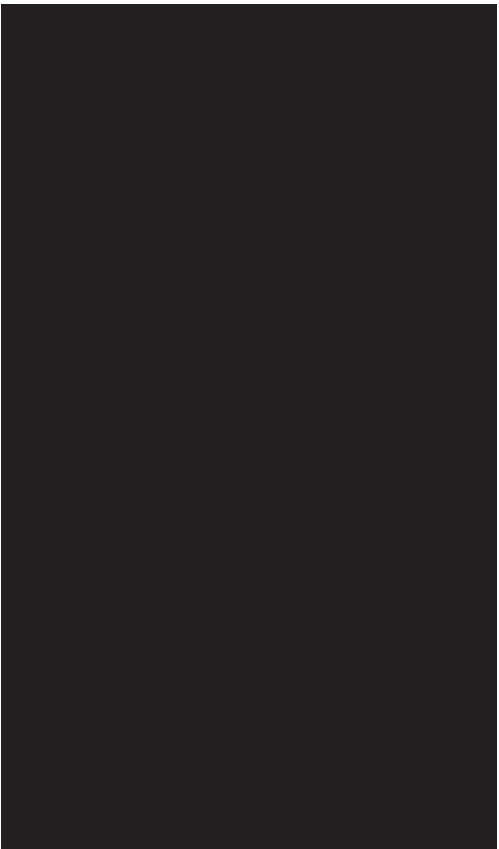
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Q. If you'll turn to tab 5 in your binder.

A. This is the binder you gave me?

Q. Correct. Sorry, the binder that I gave you.

A. Keep things organized here, and you said tab number 5.

Q. Tab number 5, and we have marked

1 it, if you have the right one, as Exhibit 71 in  
2 the lower right-hand corner; is that right?  
3 A. Yes.  
4 Q. Okay. And Exhibit 71, for the  
5 record, is ENDO-CHI\_LIT-00241435. We've marked  
6 it in the upper right-hand corner E0715.  
7 Do you see that?  
8 A. I do, yes.  
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to put one thing on the record that we talked about before we started. I don't think there's any disagreement on this, but all of your questions today are being asked in Mr. Lortie's capacity as a 30(b)(6) witness; is that right?

MS. SCULLION: They are.

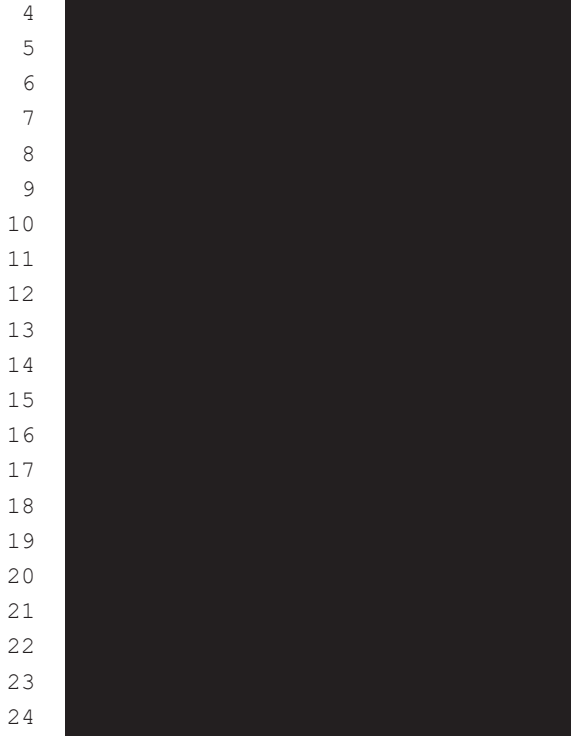
MR. LIMBACHER: Thank you.

BY MS. SCULLION:

Q. Mr. Lortie, just -- can you just

1 go back to Exhibit 68, the chart of the sales  
2 for just one second, please.

3 A. Yes.



14 A. May I just take a minute?

15 Q. Yeah, absolutely.

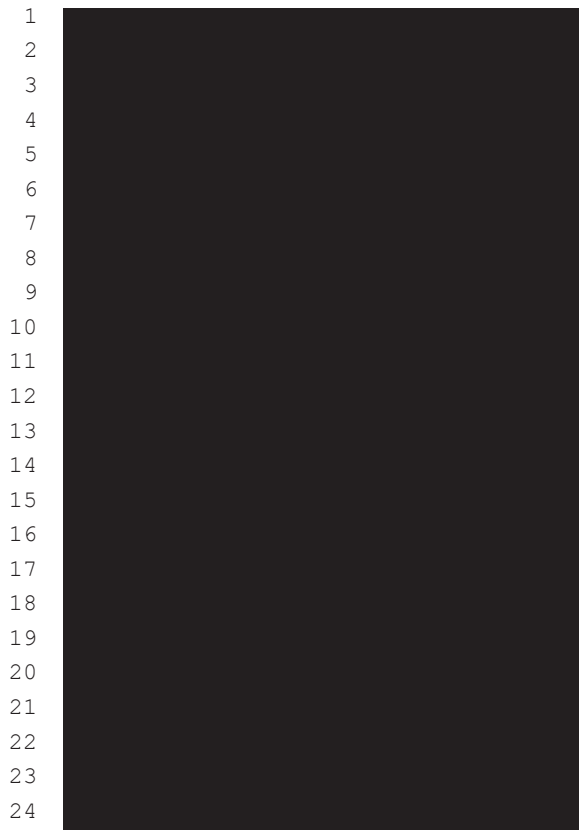
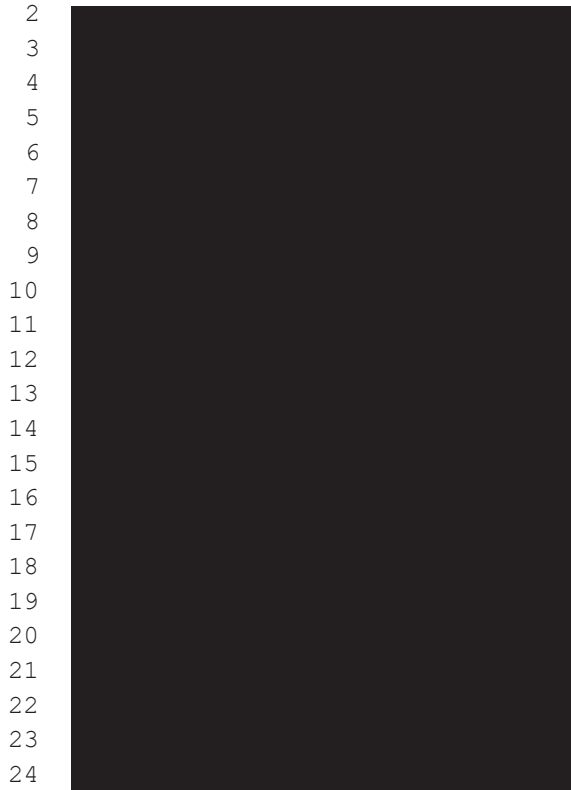
16 A. I just wanted to understand the  
17 context of the communication.

18 Q. Certainly.

19 A. (Witness reviews document.)  
20 Okay. I looked quickly. I think I understand  
21 the general context. If you've got a specific  
22 question, I'll look carefully at that page.

23 Q. Sure. If you'll turn to page  
24 715.13.

1 A. Okay.



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MR. LIMBACHER: Object to form  
and to the extent it falls outside the  
scope of the narrow topics on which he's  
being produced today.

MS. SCULLION: To address  
Mr. Limbacher's last objection, all this  
is in the context trying to understand  
the basis, the foundation on which Endo  
was putting together its policies and  
processes with respect to abuse and  
diversion of opioids.

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BY MS. SCULLION:

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1 hour. Whenever is a good time to take a  
2 break.  
3 MS. SCULLION: Want to take a  
4 short break?  
5 MR. LIMBACHER: Thank you.  
6 THE VIDEOGRAPHER: Off the  
7 record, 11:41.  
8 (Brief recess.)  
9 THE VIDEOGRAPHER: We are back on  
10 the record at 11:49.  
11 BY MS. SCULLION:  
12 Q. Mr. Lortie, if you'll turn to tab  
13 6 of the binder that I provided to you.  
14 A. Yes.  
15 Q. And the bottom right-hand corner  
16 it should say Exhibit 72.  
17 A. Yes.  
18 Q. Okay. And Exhibit 72 for the  
19 record is ENDO-OPIOID\_MDL-01500831, and it's  
20 marked in the upper right-hand corner E778.1.  
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Q. If you go to tab 2 of the binder that I provided to you.

A. I'm on tab 2, yes.

Q. And tab 2 is Exhibit 10 to your prior session of your deposition.

Do you see that?

A. I do, yes.



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MR. LIMBACHER: Object as beyond the scope of the topics on which he's been designated. Indeed, Jen, sales --

MS. SCULLION: You can just say beyond the scope. I don't want to take up more time on the record.

MR. LIMBACHER: Well, I'm --

MS. SCULLION: Because then it's not going to come out of my time, my two hours.

MR. LIMBACHER: I'm somewhat surprised that you would be trying to do this. Topic Number 7 in your 30(b)(6) notice is specific to training of sales representatives. This witness has not been designated and he is not here to answer questions with regard to that topic.

BY MS. SCULLION:

Q. I think you've answered that you

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don't know, correct?

MR. LIMBACHER: Object to form, same objections.

THE WITNESS: Right.

BY MS. SCULLION:

Q. Okay, thanks.

If you'll turn to tab 7 of the binder I provided to you -- I apologize, tab 4.

A. Tab 4?

Q. Tab 4. And it's marked in the lower right-hand corner Exhibit 70.

Do you see that?

A. I do.

Q. Okay. And for the record it's ENDO-OPIOID\_MDL-01692316, and in the upper right-hand corner we've marked it as E548.

MR. LIMBACHER: Well, then take

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your time and review the document.

MS. SCULLION: Can I ask that we do it off the record then, because we have the two hours. I would have expected this was something he'd be -- would have reviewed as part of his preparation.

MR. LIMBACHER: Well, I object to that unnecessary comment, but please go ahead and review the document.

THE WITNESS: (Witness reviews document.) Okay, I've taken a look at it.

BY MS. SCULLION:

Q. All right, thank you.

If you'll turn to page 548.2 -- well, strike that.

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Q. Okay. And Exhibit 7 is a copy of the June 2007 Risk Minimization Action Plan for Opana ER; correct?

A. Yes, it is.

Q. We've marked it again in the upper right-hand corner with E numbers, we have E554. If you'll go to E544.7, looking at the first full paragraph begins "While addiction."

Do you see that?

A. I do, yes.

Q. Okay. And going to the second sentence of that paragraph reads, "Although lack

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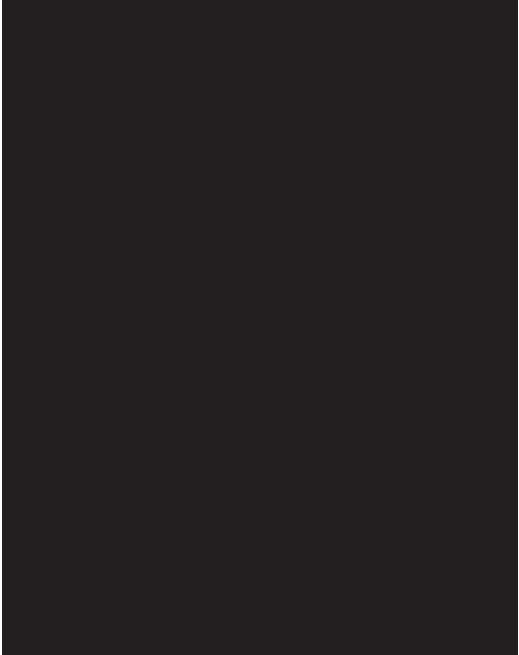
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MS. SCULLION: I think that's all  
I have today.  
THE VIDEOGRAPHER: Going off the  
record at 12:41.  
(Pause.)

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1 THE VIDEOGRAPHER: We are back on  
2 the record at 12:43.  
3 BY MR. LENISKI:  
4 Q. Good afternoon, Mr. Lortie. My  
5 name is Joe Leniski, we met previously. I  
6 represent plaintiffs in the state of Tennessee,  
7 and I'm going to adopt for purposes of this  
8 examination the same objection that we made in  
9 your -- the prior iteration of your examination  
10 back in, I guess, that was January of this year.  
11 MR. LENISKI: Is that fair?  
12 MR. LIMBACHER: You'd have to  
13 remind me exactly what that is.  
14 MR. LENISKI: It was an objection  
15 to scope, lack of notice, lack of  
16 producing documents, time allotted, et  
17 cetera.  
18 MR. LIMBACHER: Well, we  
19 acknowledge your position, but I'm not  
20 sure we agree with it, but go ahead with  
21 your questioning.  
22 MR. LENISKI: That's fair enough.  
23 BY MR. LENISKI:  
24 Q. Mr. Lortie, would you please pull

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1 out Exhibit Campanelli-212 that was shown to you  
2 earlier today?  
3 A. Yes, I have that.  
4 Q. And keeping in mind that this  
5 is -- my questions are going to be covered under  
6 the scope of the topics as agreed to between  
7 counsel for Endo and counsel for the MDL, I want  
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BY MR. LENISKI:

Q. Consistent with your designation under Topic 32, in which you're designated to testify about your process for ensuring compliance with, among other things, state laws and regulations concerning the sale of opioids, and I'm paraphrasing, with respect to suspected abuse and diversion issues, did Endo understand

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regards to Tennessee specifically.

BY MR. LENISKI:

Q. At any time did Endo use any process for complying with Tennessee's requirements that Endo maintain "appropriate safeguards" against abuse or diversion of prescription opioids?

MR. LIMBACHER: Same objections.

THE WITNESS: Again, with regards to Tennessee specifically, I do not know.

BY MR. LENISKI:

Q. Okay. Do you know whether any -- there was any process used by Endo to ensure that it was complying with Tennessee law that was unique or particular to Tennessee law?

MR. LIMBACHER: Same objections.

THE WITNESS: With regards to Tennessee specifically, I don't know.

BY MR. LENISKI:

Q. Okay. Did Endo understand that as a condition of Endo being permitted to distribute its opioid products in Tennessee, that it had to ensure that the drugs were only

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that Tennessee regulates distribution of controlled substances within its borders?

MR. LIMBACHER: Same objections.

THE WITNESS: I don't know.

BY MR. LENISKI:

Q. Okay. Did Endo understand -- have an understanding under Tennessee law prescription opioids are defined as Schedule II controlled substances because they inherently have a "high potential for abuse" and "they may lead to severe psychic or physical dependence"?

MR. LIMBACHER: Same objections.

It's beyond the scope of the topics on which he's been designated.

THE WITNESS: I don't know

specifically with regards to Tennessee.

BY MR. LENISKI:

Q. Did anyone understand that as a condition of Endo being permitted to distribute its opioid products in Tennessee, that Tennessee law required it to maintain appropriate safeguards against abuse and diversion?

MR. LIMBACHER: Same objections.

THE WITNESS: I don't know with

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being distributed to serve "legitimate medical purposes"?

MR. LIMBACHER: Same objections.

THE WITNESS: With regards specifically to Tennessee, I don't know.

BY MR. LENISKI:

Q. Okay. At any time did Endo employ or utilize any processes for complying or ensuring that it was complying with Tennessee's requirement that prescription opioids only be distributed to serve legitimate medical purposes?

MR. LIMBACHER: Same objections.

THE WITNESS: Beyond those for all states, with regards to Tennessee, I don't know.

BY MR. LENISKI:

Q. So you're not aware of any particularly unique or otherwise process used by Endo to comply with Tennessee law in that regard?

MR. LIMBACHER: Same objections.

THE WITNESS: That's correct.

BY MR. LENISKI:

1 Q. Did Endo understand that if it  
2 did not comply with those precepts of Tennessee  
3 law that it would be unlawful for Endo to  
4 distribute prescription opioids in that state?

5 MR. LIMBACHER: Same objections.

6 THE WITNESS: With regards  
7 specifically to Tennessee, I don't know.

8 BY MR. LENISKI:

9 Q. Okay. Did Endo pursuant to its  
10 processes to address abuse and diversion in the  
11 state of Tennessee ever consider halting the  
12 sale and marketing of Schedule II pharmaceutical  
13 opioids in that state?

14 MR. LIMBACHER: Same objections,  
15 and I believe that was asked and  
16 answered previously of Mr. Lortie.

17 THE WITNESS: I don't recall  
18 specifically, no.

19 BY MR. LENISKI:

20 Q. And just so we're clear, given  
21 the objection, I'm asking about any  
22 pharmaceutical opioids, not just Opana ER; is  
23 that clear?

24 A. That's clear, yes.

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1 Q. Okay. And your answer would  
2 still be the same; that you're not aware of  
3 any -- as part of any process for addressing  
4 abuse and diversion in the state of Tennessee,  
5 you're not aware of any efforts by Endo to -- or  
6 discussions about halting the sale of  
7 prescription opioids in that state, correct?

8 MR. LIMBACHER: Same objections  
9 and asked and answered.

10 THE WITNESS: Yeah, again,  
11 referencing my previous testimony, I  
12 think we had a discussion about that,  
13 but I don't recall specifically any  
14 beyond that.

15 BY MR. LENISKI:

16 Q. Okay. The questions I'm going to  
17 be asking you now, can we agree that these  
18 questions will apply to the time frame after you  
19 left Endo in October of 2016; is that clear?

20 A. Okay.

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BY MR. LENISKI:

Q. At the time you left the company, was Endo familiar with the pro -- or aware of the problem of opioid abuse by expectant mothers in Tennessee resulting in babies being born with what I'll call neonatal abstinence syndrome?

MR. LIMBACHER: Same objections.

THE WITNESS: That I do not know.

BY MR. LENISKI:

Q. Okay. Do you know as a foundational question what neonatal abstinence syndrome is?

A. Not specifically, I'm not a medical professional, but I think I can draw a conclusion as to what you're referring to.

Q. Okay. Well, as Endo's corporate representative at the time of your departure in 2016, was one issue that Endo was aware of

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regarding abuse and diversion of its product the relatively high rate of babies born with neonatal abstinence syndrome in the state of Tennessee?

MR. LIMBACHER: Object as beyond the scope of the topics on which he's been designated.

THE WITNESS: I'm not aware of that.

BY MR. LENISKI:

Q. Okay. Did Endo implement any processes for -- used in the monitoring, investigation, reporting or halting of NAS births in Tennessee following your departure?

MR. LIMBACHER: Same objections.

THE WITNESS: I'm not aware.

(Document marked for identification as Endo-Lortie Deposition Exhibit No. 75.)

BY MR. LENISKI:

Q. One exhibit for you. Hand you a document identified as Exhibit 75 to your



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MR. LENISKI: Subject to recross,  
I have no further questions.  
THE VIDEOGRAPHER: Going off the  
record at 12:59 p m.  
(Witness excused.)  
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C E R T I F I C A T I O N

I, MARGARET M. REIHL, a  
Registered Professional Reporter,  
Certified Realtime Reporter, Certified  
Shorthand Reporter, Certified LiveNote  
Reporter and Notary Public, do hereby  
certify that the foregoing is a true and  
accurate transcript of the testimony as  
taken stenographically by and before me  
at the time, place, and on the date  
hereinbefore set forth.

I DO FURTHER CERTIFY that I  
am neither a relative nor employee nor  
attorney nor counsel of any of the  
parties to this action, and that I am  
neither a relative nor employee of such  
attorney or counsel, and that I am not  
financially interested in the action.

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Margaret M. Reihl, RPR, CRR, CLR  
CSR #XI01497 Notary Public

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ACKNOWLEDGMENT OF DEPONENT

I, BRIAN LORTIE, do hereby  
certify that I have read the foregoing  
pages, and that the same is a correct  
transcription of the answers given by me  
to the questions therein propounded,  
except for the corrections or changes in  
form or substance, if any, noted in the  
attached Errata Sheet.

\_\_\_\_\_  
BRIAN LORTIE                      DATE

Subscribed and sworn to before me this

\_\_\_\_ day of \_\_\_\_\_, 2019.

My commission expires: \_\_\_\_\_

\_\_\_\_\_  
Notary Public